IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RONALD LONG, :

Plaintiff,

v. : No. 03-3054

HDJ COMPANY, INC.,

Defendant.

MOTION TO QUASH SUBPOENA

Pursuant to Fed.R.Civ.P. 45(c)(3)(A), Defendant, HDJ Company, Inc., through its attorneys, Kegel Kelin Almy & Grimm LLP, hereby moves to quash the subpoena served on Bertz and Co. In support of this Motion, Defendant relies on the Brief attached hereto.

Respectfully submitted,

KEGEL KELIN ALMY & GRIMM LLP

By:_

Amy G. Macinanti, Esquire Attorney I.D. No. 73609 24 N. Lime Street Lancaster, PA 17602

(717) 392-1100

Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion to Quash Subpoena was served this 30th day of March, 2004, by hand, upon the following person:

Nina B. Shapiro, Esq. 53 North Duke Street, Suite 201 Lancaster, PA 17602

Amy G. Macinanti, Esquire